

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FITCHBURG GAS & ELECTRIC LIGHT COMPANY

D.T.E. 02-24/25

**ATTORNEY GENERAL'S FOURTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's Fourth Set of Document and Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Fitchburg Gas & Electric Light Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Fitchburg Gas & Electric Light Company and its gas division. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FITCHBURG GAS & ELECTRIC LIGHT COMPANY

D.T.E. 02-24/25

**ATTORNEY GENERAL'S FOURTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following is the Attorney General's Fourth Set of Document and Information Requests in the above referenced docket for Mr. Aikman.

- AG-4-1 Please provide a complete copy of the depreciation study and workpapers used to determine the depreciation accrual rates currently being used by the Company, including all of the curve analyses for each plant account along with the resulting statistics. Please also provide the assumed average service life and net salvage value used to determine the existing accrual rates.
- AG-4-2 Please provide copies of all notes taken by Mr. Aikman during all meetings with Company employees regarding the depreciation study that he prepared in this case.
- AG-4-3 Please provide all workpapers generated by Mr. Aikman in the preparation of his depreciation study.
- AG-4-4 Please provide all of the workpapers, calculations, formulas, and assumptions used by Mr. Aikman to perform his salvage and retirement cost study in this case.
- AG-4-5 Please provide all of the workpapers, calculations, formulas, and assumptions used by Mr. Aikman to allocate the test year end balance of accumulated depreciation this case.
- AG-4-6 Please provide the Conformance Index value, the Retirement Index, the Cycle Index, and all other statistics calculated for each plant account for each life band that Mr. Aikman determined in his life analysis.

- AG-4-7 Please also provide a ranking of those curves and indices from the best fit to the worst fit for each plant account / subaccount.
- AG-4-8 Please provide all studies referred to by Mr Aikman in the preparation of his testimony regarding the service life of plastic mains and services..
- AG-4-9 Please provide the depreciation analysis of Account 367 -- Mains by pipe composition (i.e. Plastic, Coated Steel , Cast and Wrought Iron). Please also provide the dollar balance of mains by pipe composition as of the end of the test year.
- AG-4-10 Please indicate the year in which the Company last installed cast iron main in plant in service.
- AG-4-11 Please provide a complete and detailed description of the Company's "FIFO" pricing of retirements. Please also indicate to what accounts the "FIFO" pricing applies. .
- AG-4-12 Please indicate whether the "FIFO" methodology was also applied to determine the vintage of retirements.
- AG-4-13 Please provide the depreciation analysis of Account 380 -- Services by pipe composition (i.e. Plastic, Coated Steel , Cast and Wrought Iron). Please also provide the dollar amount of service by pipe composition.
- AG-4-14 Please provide the history dollar amount and feet of main replaced under the Company's cast iron main replacement program that was ordered by the Department.
- AG-4-15 Please provide the Company's most recent forecast of the dollar amount and the feet of cast iron main that it plans to replace as ordered by the Department.
- AG-4-16 Please provide the history of the dollar amount and the number of services replaced under the Company's cast iron service replacement program that was ordered by the Department.
- AG-4-17 Please provide the Company's most recent forecast of the dollar amount and the number of cast iron services that it plans to replace as ordered by the Department.
- AG-4-18 Please provide a complete and detailed description of the sleeving technique used by the Company when it inserts sleeves into mains.
- AG-4-19 Please provide a ten-year history of the dollar amount and the number of feet of

mains that have been sleeved with inserts by the Company.

- AG-4-20 Please provide a complete and detailed description of the accounting methodology that the Company uses to record the costs of main sleeve inserts and the associated retirements. Please also provide three examples of such accounting.
- AG-4-21 Please provide a complete copy of the document containing the DTE directive requiring the expensing of meter removals referred to on page 32 of Mr. Aikman's testimony..
- AG-4-22 Please provide a copy of the Company's most recent long range supply forecast.
- AG-4-23 Please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the "dollar-weighted component life estimate" for Account 390.

Dated: July 18, 2002